

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

JOHN HANCOCK LIFE INSURANCE COMPANY (U.S.A.); JOHN HANCOCK LIFE INSURANCE COMPANY (U.S.A.) SEPARATE ACCOUNT 6A; JOHN HANCOCK LIFE INSURANCE COMPANY (U.S.A.) SEPARATE ACCOUNT 131; JOHN HANCOCK FUNDS II; JOHN HANCOCK VARIABLE INSURANCE TRUST; JOHN HANCOCK SOVEREIGN BOND FUND; JOHN HANCOCK BOND TRUST; JOHN HANCOCK STRATEGIC SERIES; and JOHN HANCOCK INCOME SECURITIES TRUST,

Plaintiffs,

vs.

ALLY FINANCIAL INC. f/k/a GMAC, LLC; ALLY BANK f/k/a GMAC BANK; ALLY SECURITIES, LLC f/k/a RESIDENTIAL FUNDING SECURITIES, LLC f/k/a RESIDENTIAL FUNDING SECURITIES CORPORATION; GMAC MORTGAGE GROUP, LLC; CITIGROUP GLOBAL MARKETS INC.; CREDIT SUISSE SECURITIES (USA) LLC f/k/a CREDIT SUISSE FIRST BOSTON, LLC; BEAR, STEARNS & CO. INC.; DEUTSCHE BANK SECURITIES, INC.; J.P. MORGAN SECURITIES LLC f/k/a J.P. MORGAN SECURITIES, INC.; GOLDMAN, SACHS & CO.; BANC OF AMERICA SECURITIES LLC; BARCLAYS CAPITAL INC.; RBS SECURITIES INC. f/k/a GREENWICH CAPITAL MARKETS, INC.; MERRILL LYNCH, PIERCE, FENNER & SMITH INC.; UBS SECURITIES LLC; BRUCE J. PARADIS; KENNETH M. DUNCAN; DAVEE L. OLSON; RALPH T. FLEES; JACK R. KATZMARK; LISA R. LUNDSTEN; DAVID C. WALKER; DIANE S. WOLD; JAMES G. JONES; DAVID M. BRICKER; and JAMES N. YOUNG,

Defendants.

Case No. 12-CV-01841
(ADM-TNL)

**JOINT STIPULATION
EXTENDING TIME TO
RESPOND TO
COMPLAINT AND
SETTING BRIEFING
SCHEDULE**

This Stipulation is entered into by and among plaintiffs John Hancock Life Insurance Company (U.S.A.); John Hancock Life Insurance Company (U.S.A.) Separate Account 6A; John Hancock Life Insurance Company (U.S.A.) Separate Account 131; John Hancock Funds II; John Hancock Variable Insurance Trust; John Hancock Sovereign Bond Fund; John Hancock Bond Trust, John Hancock Strategic Series; and John Hancock Income Securities Trust (collectively, “Plaintiffs”) and defendants Ally Financial Inc. f/k/a GMAC, LLC; Ally Bank f/k/a GMAC Bank; Ally Securities, LLC f/k/a Residential Funding Securities, LLC f/k/a Residential Funding Securities Corporation; GMAC Mortgage Group, LLC; Citigroup Global Markets Inc.; Credit Suisse Securities (USA) LLC f/k/a Credit Suisse First Boston, LLC; Bear, Stearns & Co. Inc; Deutsche Bank Securities Inc.; J.P. Morgan Securities LLC f/k/a J.P. Morgan Securities, Inc.; Goldman, Sachs & Co.; Banc of America Securities LLC; Barclays Capital Inc.; RBS Securities Inc. f/k/a Greenwich Capital Markets, Inc.; Merrill Lynch, Pierce, Fenner & Smith Inc.; UBS Securities LLC; Bruce J. Paradis; Kenneth M. Duncan; Davee L. Olson; Ralph T. Flees; Jack R. Katzmark; Lisa R. Lundsten; David C. Walker; Diane S. Wold; James G. Jones; David M. Bricker; and James N. Young (collectively, “Defendants”), through the undersigned counsel.

WHEREAS, on July 27, 2012, Plaintiffs filed their initial Complaint in this action;

WHEREAS, certain of the Defendants have agreed to waive service of the Complaint;

WHEREAS, on August 9, 2012, Plaintiffs served the Complaint on the last among the Defendants to be served;

WHEREAS, certain Defendants believe that some or all of Plaintiffs' claims against them may be subject to arbitration;

WHEREAS, Defendants Bruce J. Paradis, Kenneth M. Duncan, Davee L. Olson, Ralph T. Flees, Jack R. Katzmark, Lisa R. Lundsten, David C. Walker, Diane S. Wold, James G. Jones, David M. Bricker, and James N. Young (the "Individual Defendants"), Defendant Barclays Capital Inc., Defendant Credit Suisse Securities (USA) LLC, and Defendants Deutsche Bank Securities Inc., RBS Securities Inc. f/k/a Greenwich Capital Markets, Inc. and UBS Securities LLC entered into interim stipulations with Plaintiffs to continue their time to respond to the Complaint while the instant global Stipulation was being finalized;

WHEREAS, the Court issued orders on the interim stipulations extending Defendant Credit Suisse Securities (USA) LLC's and the Individual Defendants' time to respond to the Complaint to September 17, 2012, extending Defendant Barclays Capital Inc.'s time to respond to the Complaint to September 20, 2012, and ordering those Defendants to submit a proposed briefing schedule to the Court for any Rule 12 motions;

WHEREAS, no scheduling order or case management order has been entered in this action and no other parties have made a request for an extension of any deadline;

WHEREAS, the parties have agreed, subject to the approval of the Court, on a single and consistent schedule for the Defendants to, jointly or individually, move against, answer or otherwise respond to the Complaint, including with respect to any applicable right to arbitration of Plaintiffs' claims, that enables the parties fully and properly to address the issues relevant to such motions.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the Plaintiffs and Defendants, through their undersigned counsel, subject to the approval of the Court, as follows:

1. Defendants shall serve and file their initial submissions in support of any joint or individual motions to dismiss the Complaint and/or to compel arbitration (the “Dismissal Motions”) or their answers or other responsive pleadings in this Court on or before September 24, 2012.

2. Plaintiffs shall serve and file their oppositions to any such Dismissal Motions on or before November 16, 2012.

3. If Defendants have filed Dismissal Motions, they shall serve and file their reply memoranda in support of their Dismissal Motions on or before December 21, 2012.

4. Neither Plaintiffs nor Defendants waive their rights to seek from each other or the Court additional adjournments or extensions of the above deadlines; and the entry into this agreement and submission of this Stipulation shall not waive, and the parties expressly preserve, all rights, claims and defenses, including, without limitation, all defenses relating to jurisdiction, venue and arbitrability.

Dated: August 23, 2012

Respectfully submitted,

Dated: August 23, 2012

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